

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE**

SSAC ACQUISITION CORP.,

Plaintiff,

v.

SINO SWEARINGEN AIRCRAFT CORPORATION,
EMIRATES GLOBAL CAPITAL US, LLC, AND
ACTION AVIATION INVESTORS LLC,

Defendants.

C.A. No. 07-842 (JJF)

**MOTION TO EXTEND DEFENDANTS' TIME
TO RESPOND TO COMPLAINT**

COME NOW Defendants Sino Swearingen Aircraft Corporation ("SSAC") Emirates Global Capital US, LLC ("EGC"), and Action Aviation Investors, LLC ("AAI") by and through their undersigned counsel, and hereby move to extend the time to move, answer or otherwise respond to the complaint in the above captioned matter.

Upon information and belief, SSAC, EGC and AAI were served through their registered agent in this action on December 24, 2007. SSAC, EGC and AAI reserve all rights with regard to propriety of service under this Court's rules.

Defendants seek, by this motion, to extend their time to file a motion, or answer or to otherwise respond to the Complaint until no earlier than 30 days from the date of this Motion. Defendants requested the agreement to a similar extension from counsel for Plaintiff SSAC Acquisition. However, Plaintiff's counsel insisted on unacceptable conditions to any such agreement, requiring Defendants to seek relief from the Court instead.

The requested extension of Defendants' time to respond to the Complaint is warranted due to the complex nature of the allegations in the complaint, the fact that the majority of SSAC's, EGC's and AAI's shareholders are located overseas, and the fact that the Defendants only recently retained counsel to defend them in this action, which was filed just before the year-end holidays in December.

WHEREFORE, for these and such other reasons as may appear just and equitable to this Honorable Court, SSAC, EGC and AAI request that this Motion to Extend Time to Respond to Complaint until February 13, 2008 be granted, and that the attached Order be entered at the earliest convenience of the Court.

January 14, 2007

Respectfully submitted,

WERB & SULLIVAN

/s/ Brian A. Sullivan
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and

LAW OFFICES OF LAI &
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ORDER

Upon consideration of the Motion to Extend Defendants' Time to Respond to Complaint and the Court being fully informed, it is hereby

ORDERED this ____ day of _____, 2008 that the Motion be GRANTED and that the Defendant Sino Swearingen Aircraft Corporation, Emirates Global Capital US LLC and Action Aviation Investors, LLC, shall answer or otherwise respond to the Complaint on or before February 13, 2008.

Honorable Joseph J. Farnan
United States District Court Judge

**CERTIFICATION OF COUNSEL PURSUANT TO DISTRICT COURT LOCAL
RULE 7.1.1**

I hereby certify a reasonable effort has been made to reach agreement with the opposing party on the matters set forth in the foregoing Motion.

/s/ Brian A. Sullivan
Brian A. Sullivan (2098)

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ORDERED this ____ day of _____, 2008 that the Motion be GRANTED and that the Defendant Sino Swearingen Aircraft Corporation, Emirates Global Capital US LLC and Action Aviation Investors, LLC, shall answer or otherwise respond to the Complaint on or before February 13, 2008.

Honorable Joseph J. Farnan
United States District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2008, I caused one copy of the foregoing document to be served upon the persons listed below in the manner indicated:

Hand Delivery

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